UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

JUL - 8 2016

Charlie Seelig, Town Administrator
Town of Halifax
499 Plymouth St.
Halifax, MA 02338

Re: Request for Information Pursuant to Section 308 of the Clean Water Act
EPA Docket No. CWA-308-R01-FY16-72 for Richmond Water Park Water Treatment Plant NPDES Permit No. MAG640008

Dear Mr. Seelig:

Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a), authorizes the U. S. Environmental Protection Agency ("EPA") to require the owner or operator of a point source to provide information needed to determine whether there has been a violation of an effluent standard promulgated under the Clean Water Act, 33 U.S.C. § 1251 et seq. Under the authority of Section 308, EPA hereby requires the Town of Halifax, Massachusetts (the "Town") to provide the information requested below.

A review of our records indicates that the Richmond Water Park Water Treatment Plant ("WTP") has failed to comply with certain conditions of the National Pollutant Discharge Elimination System ("NPDES") Permit (NPDES No. MAG640008) issued to the facility by EPA. In particular, EPA notes reported violations of both the daily maximum and monthly average limitations for total residual chlorine ("TRC") for almost every month since February 2013. Enclosed with this letter is a table that shows the violations reported by the facility to EPA on a month by month basis. Please note that for a number of months (February 2014, May 2014, August 2014, December 2014, January 2016 and April 2016) NetDMR may contain reporting errors on the part of the facility. These errors should be corrected, as appropriate.

Within 20 days of receiving this Request, please provide an explanation of the causes of the effluent limit violations cited above. Also describe the steps that the Town has already taken to address these violations and a plan to eliminate the violations, including a schedule to implement all required measures necessary to eliminate the violations.

Information submitted pursuant to this Request **shall be provided in writing and in an electronic format** to EPA at the following addresses:

US Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912
Attn: David Turin (Mailcode: OES04-3)

turin.david@epa.gov.

And to the Massachusetts Department of Environmental Protection at the following addresses:

Massachusetts Department of Environmental Protection
Southeast Region Main Office
20 Riverside Drive
Lakeville, MA 02347
Attn: David Burns

david.burns@state.ma.us.

Compliance with this Request is mandatory. Failure to respond fully and truthfully, or to adequately justify any failure to respond within the time frame specified above, also constitutes a violation of the Act subject to enforcement action, including the assessment of penalties. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal prosecution under 18 U.S.C. § 1001.

If you or your staff have technical questions regarding this Request, please contact David Turin, of my staff at (617) 918-1598, or have your attorney contact Jeffrey Kopf, Senior Enforcement Counsel at (617) 918-1796.

Sincerely,

James Chow, Manager
Technical Enforcement Office
Office of Environmental Stewardship

Enclosure: Table showing facility TRC excursions

cc: Keith Swanson, Supt. Halifax Water Department
David Burns MA DEP (via email)

DMR Summary

10/1/2012 12:00:00 AM to 5/31/2016 12:00:00 AM

Permit MAG640008

Permit Name	Version Nmbr	Curr. Major Minor Status	Issue Date	Effective Date	Expiration Date
TOWN OF HALIFAX - RICHMOND WATER PARK W T P	0	Minor	9/13/12	10/1/12	9/30/14

Version # 0

Outfall 001A

00400 pH / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
10/1/12	9/30/14	GRAB	Weekly

Limit		
Limit Unit Desc	Standard Units	Standard Units
Statistical Base	MINIMUM	MAXIMUM
Limit Value	6.5	8.3
DMR Values		
10/31/12	7.71	8.1
11/30/12	7.16	8.5
12/31/12	7.25	8.7
1/31/13	6.8	7.4
2/28/13	7.4	7.61
3/31/13	7.42	7.7
4/30/13	7.66	8
5/31/13	7.4	7.69
6/30/13	7.1	7.59
7/31/13	6.6	7.57
8/31/13	7.1	7.86
9/30/13	6.8	7.79
10/31/13	7.39	7.79
11/30/13	7.33	7.6
12/31/13	7.16	7.48
1/31/14	7.19	7.76
2/28/14	7.39	7.63
3/31/14	7.14	7.55
4/30/14	7.23	7.73
5/31/14	7.35	7.86
6/30/14	7.37	7.77
7/31/14	7.29	7.95
8/31/14	7.49	7.93
9/30/14	7.68	7.83
10/31/14	7.5	7.72
11/30/14	7.48	7.8
12/31/14	7.55	7.9
1/31/15	7.75	7.43
2/28/15	7.62	7.29
3/31/15	7.71	7.35
4/30/15	7.82	7.64
5/31/15	7.83	7.47
6/30/15	7.56	7.78
7/31/15	7.38	7.73
8/31/15	7.29	7.79
9/30/15	7.41	7.85
10/31/15	7.4	7.8
11/30/15	7.4	7.83
12/31/15	7.15	7.44

DMR Summary

10/1/2012 12:00:00 AM to 5/31/2016 12:00:00 AM

Permit MAG640008

Version # 0

Outfall 001A

00400 pH / Location 1 / Season 0 / Base

DMR Values		
1/31/16	7.38	8.1
2/29/16	7.42	7.58
3/31/16	7.5	7.7
4/30/16	7.28	7.9
5/31/16	Not Received	Not Received

00530 Solids, total suspended / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
10/1/12	9/30/14	COMPOS	Weekly

Limit		
Limit Unit Desc	Milligrams per Liter	Milligrams per Liter
Statistical Base	MO AVG	DAILY MX
Limit Value	30	50
DMR Values		
10/31/12	4	4
11/30/12	<=4	<=4
12/31/12	11.5	11.5
1/31/13	<4	<4
2/28/13	<4	<4
3/31/13	<4	<4
4/30/13	<4	<4
5/31/13	38	38
6/30/13	36	36
7/31/13	51	51
8/31/13	27	27
9/30/13	13	13
10/31/13	75	75
11/30/13	<4	<4
12/31/13	20	20
1/31/14	<4	<4
2/28/14	26	26
3/31/14	4	4
4/30/14	4	4
5/31/14	5.5	5.5
6/30/14	<4	<4
7/31/14	4	4
8/31/14	11	11
9/30/14	<4	4
10/31/14	<4	4
11/30/14	6	6
12/31/14	8	8
1/31/15	4	4
2/28/15	5	5
3/31/15	7.5	<4
4/30/15	4	4
5/31/15	6.5	6.5
6/30/15	9	9
7/31/15	0	0

DMR Summary

10/1/2012 12:00:00 AM to 5/31/2016 12:00:00 AM

Permit MAG640008

Version # 0

Outfall 001A

00530 Solids, total suspended / Location 1 / Season 0 / Base

DMR Values		
8/31/15	4	4
9/30/15	4	4
10/31/15	<40	<40
11/30/15	4	4
12/31/15	4	4
1/31/16	<4	<4
2/29/16	<4	<4
3/31/16	<4	4
4/30/16	<4	<4
5/31/16	Not Received	Not Received

50050 Flow, in conduit or thru treatment plant / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
10/1/12	9/30/14	TOTALZ	Weekly

Limit	
Limit Unit Desc	Million Gallons per Day
Statistical Base	DAILY MX
Limit Value	.05
DMR Values	
10/31/12	.0144
11/30/12	.0144
12/31/12	.0147
1/31/13	.0286
2/28/13	.0284
3/31/13	.0138
4/30/13	.0134
5/31/13	.0146
6/30/13	.0164
7/31/13	.0145
8/31/13	.0153
9/30/13	.0153
10/31/13	.0144
11/30/13	.0155
12/31/13	.0138
1/31/14	.141
2/28/14	.0141
3/31/14	.0143
4/30/14	.0143
5/31/14	.0143
6/30/14	.0166
7/31/14	.285
8/31/14	.0144
9/30/14	.0142
10/31/14	.0469
11/30/14	.0152
12/31/14	.0142
1/31/15	.0143
2/28/15	.0142

DMR Summary

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Permit MAG640008

Version # 0

Outfall 001A

50050 Flow, in conduit or thru treatment plant / Location 1 / Season 0 / Base

DMR Values	
3/31/15	.014
4/30/15	.0141
5/31/15	.027
6/30/15	.0146
7/31/15	.0278
8/31/15	.0284
9/30/15	.0141
10/31/15	.0135
11/30/15	.0131
12/31/15	.013
1/31/16	.0265
2/29/16	.0282
3/31/16	.0425
4/30/16	.0165
5/31/16	Not Received

50060 Chlorine, total residual / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
10/1/12	9/30/14	GRAB	Weekly

Limit		
Limit Unit Desc	Micrograms per Liter	Micrograms per Liter
Statistical Base	MO AVG	DAILY MX
Limit Value	11	19
DMR Values		
10/31/12	0	0
11/30/12	0	0
12/31/12	0	0
1/31/13	0	0
2/28/13	160	240
3/31/13	141	270
4/30/13	80	460
5/31/13	140	140
6/30/13	40	40
7/31/13	66	110
8/31/13	30	60
9/30/13	55	140
10/31/13	25	40
11/30/13	175	1020
12/31/13	125	430
1/31/14	137	55
2/28/14	52	19
3/31/14	163	480
4/30/14	84	350
5/31/14	.245	420
6/30/14	92	36
7/31/14	127	340
8/31/14	272	.6
9/30/14	114	560

DMR Summary

10/1/2012 12:00:00 AM to 5/31/2016 12:00:00 AM

Permit MAG640008

Version # 0

Outfall 001A

50060 Chlorine, total residual / Location 1 / Season 0 / Base

DMR Values		
10/31/14	161	500
11/30/14	152	580
12/31/14	113	.46
1/31/15	93	600
2/28/15	100	130
3/31/15	133	48
4/30/15	58	320
5/31/15	109	380
6/30/15	109	700
7/31/15	28	100
8/31/15	66	320
9/30/15	26	300
10/31/15	260	100
11/30/15	24	100
12/31/15	20	80
1/31/16	24	10
2/29/16	94	35
3/31/16	72	21
4/30/16	31	12
5/31/16	Not Received	Not Received